

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:** §  
§                   **CASE No. 20-50805-rbk**  
**KRISJENN RANCH, LLC**         §  
§                   **CHAPTER 11**  
**WRIGHT.**             §                   **(Jointly Administered)**

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**KRISJENN RANCH, LLC, ET AL.**         §  
§  
**PLAINTIFFS,**                             §                   **Adversary No. 20-05027-rbk**  
**vs.**                                             §  
§  
**DMA PROPERTIES, INC. ET AL.**         §  
§  
**DEFENDANTS.**                             §

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**LARRY WRIGHT'S WITNESS AND EXHIBIT LIST FOR EXPEDITED HEARING  
ON FEBRUARY 26, 2025 AT 11:00 A.M.  
(Reference Docket No. 382)**

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Larry Wright (the “Wright”) reserves the right to call any or all of the following as witnesses at the hearings, including but not limited by affidavit, declaration, or proffer.

1. Any witness called or designated by any other party; and
2. Any rebuttal or impeachment witnesses, as appropriate.

Wright reserves all rights to introduce and/or request judicial notice of any or all of the following exhibits as evidence at the hearing, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto:

No.	Exhibit	Offered	Admitted
D-1	Wright's Motion to Vacate or Set Aside Any Ruling or Order Granting Motion to Enforce Constructive Trust (Docket No. 382)		
D-2	DMA Properties, Inc.'s Response to Wright's Motion to Vacate or Set Aside Any Ruling or Order Granting Motion to Enforce Constructive Trust (Docket No. 395)		
D-3	DMA Properties, Inc.'s Motion to Enforce Constructive Trust (Docket No. 368)		
D-4	Wright's Responses to DMA Properties, Inc.'s Motion to Enforce Constructive Trust (Docket No. 374)		
D-5	Final Judgment After Remand (Docket No. 329)		
D-6	Hearing Transcript from Hearing re: Motion to Enforce Constructive Trust on February 5, 2025		
D-7	Express H2O Pipeline & ROW, LLC (Plaintiffs) First Amended Original Petition (Docket No. 382-2)  In re: <i>Express H2O Pipeline and ROW, LLC vs. Westlake Chemical OPCO, LP</i> ; Case No. CV-00461-24-08; In the District Court of Angelina County, Texas		
D-8	Case Party List  In re: <i>Express H2O Pipeline and ROW, LLC vs. Westlake Chemical OPCO, LP</i> ; Case No. CV-00461-24-08; In the District Court of Angelina County, Texas		

D-9	Declaration of Lourdes Ortiz (Docket No. 382-4)  In re: <i>Express H2O Pipeline and ROW, LLC vs. Westlake Chemical OPCO, LP</i> ; Case No. CV-00461-24-08; In the District Court of Angelina County, Texas		
D-10	Appellants' Reply Brief (Docket No. 12)  In re: <i>DMA Properties, Inc. et al. v. KrisJenn Ranch, LLC, et al.</i> ; Case No. 5:24-cv-00365-XR; Consolidated Appeal from the United States Bankruptcy Court for the Western District of Texas Adversary Proceeding		
	Any document entered or filed in the above-styled bankruptcy case, including any exhibits thereto.		
	All exhibits necessary for impeachment and/or rebuttal purposes.		
	All exhibits identified by or offered by any other party at the hearing.		

Wright reserves the right to supplement or amend the proposed exhibits as may be required.

Wright further reserves the right to introduce any impeachment or rebuttal exhibit as may be required. The Wright further reserves the right to call any witness introduced by any other party and to call any impeachment or rebuttal witness as may be required.

Dated: February 25, 2025

Respectfully submitted,

**HAYWARD PLLC**

By: /s/ Charlie Shelton  
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*Counsel for Larry Wright*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2025, a true and correct copy of the foregoing Notice of Appearance has been served electronically via the Court's CM/ECF system upon the parties receiving electronic notice. Additionally, on February 25, 2025, or within one business day thereof, the Notice of Appearance was served via U.S. First Class Mail to all parties listed below.

<p>Christopher S. Johns cjohns@cobbjohns.com COBB AND JOHNS 14101 Highway 290 West, Suite 400A Austin, Texas 78737 Telephone: (512) 399-3150 Facsimile: (512) 572-8005</p> <p><b><i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i></b></p>	<p>Timothy Cleveland tleveland@clevelandkrist.com Austin Krist akrist@clevelandkrist.com CLEVELAND KRIST PLLC 303 Camp Croft Road, Suite 325 Austin, Texas 78746 Telephone: (512) 689-8698</p> <p><b><i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i></b></p>
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/s/ Charlie Shelton  
Charlie Shelton